

**United States District Court  
for the Eastern District of New York**

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**UNITED STATES OF AMERICA,**

vs.

Crim. Case #  
18-CR-00204 (NGG)

**KEITH RANIERE,**

Defendant.

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**MOTION FOR LEAVE TO WITHDRAW AS  
ATTORNEY FOR DEFENDANT**

Comes now Martin H. Tankleff and Steve Metcalf, counsel for defendant Keith Raniere (hereinafter “Keith”) and requests leave of court to withdraw as counsel. In support of this motion, counsel states that following:

1. Keith is currently represented by Jeffrey Lichtman, Jeffrey Einhorn and Jason Goldman (hereinafter “Lichtman Firm”), who filed their notice of appearance with this Court (Document # 1050).
2. Keith is also represented by Marc Fernich, Esq., who filed his notice of appearance with the Court July 2, 2021 (Document #1056).
3. From the time that undersigned counsel started representing Keith, we have been zealous advocates. In fact, we actively litigated the issue of restitution before this court which granted a hearing, scheduled to commence later this month.

4. It is our understanding that newly retained counsel has agreed to take over the issue of restitution, and all other aspects of representation of the defendant.
5. Prior to executing the Proposed Stipulation of Substitution of Counsel, a number of attempts were made to set up a legal phone call with Keith, all to no avail.
6. Based on the representations of newly retained counsel, and the person who is acting as Keith's Power of Attorney<sup>1</sup>, the undersigned counsel, executed a Proposed Stipulation of Substitution of Counsel<sup>2</sup>.
7. It is undersigned counsels' position that there has been a breakdown in the attorney-client relationship. To fully explain all the issues would require them to reveal attorney-client privileged information, which we are not willing to do so.
8. With undersigned counsel withdrawing and consenting to substitution of counsel, we are not leaving Keith without counsel. Keith retained the services of other counsel, The Litchman Firm filed their Notice of Appearance on June 29, 2021 and Mr. Fernich filed his on July 2, 2021.

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<sup>1</sup> The Power of Attorney executed on the 22<sup>nd</sup> of October, 2020 by Keith, was only provided to undersigned counsel, after we demanded such and it was provided by newly retained counsel, not Keith Raniere or the designee.

<sup>2</sup> Joseph McBride also counsel for defendant Keith Raniere executed the Proposed Stipulation of Substitution of Counsel.

Said counsel who are all admitted in the Eastern District of New York and elsewhere.

9. In the interest of judicial economy, and to avoid future delays, confusion, and unnecessary allegations, it is in the best interest of undersigned counsel and Keith, that the undersigned withdraw as counsel and allow newly retained counsel to take over all aspects, as they have already stated in writing to this Court.
10. It is not necessary for undersigned counsel to continue with an attorney-client privileged relationship where counsel and client are at odds with how to litigate the case and client no longer wants counsel representing him.
11. Considering this, and in the furtherance of justice, it is respectfully submitted that Martin Tankleff and Steven Metcalf be permitted to withdraw as counsel and that their designation as notified parties be removed once they are officially removed as counsel for the defendant.

**WHEREFORE**, undersigned counsel respectfully requests leave to withdraw as counsel for defendant and for such other and further relief as the Court deems just and proper.

**DATED:** July 12, 2021  
New York, New York

Respectfully submitted,

Martin H. Tankleff

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SO-ORDERED.

/s/ Nicholas G. Garaufis, U.S.D.J.  
Hon. Nicholas G. Garaufis  
Date: July 13, 2021